

Farallon Consulting, L.L.C. (Farallon) has prepared this letter to provide comments to the *Industrial Stormwater General Permit Revisions* on behalf of the Washington Trucking Associations (WTA). The WTA, a Trade Association, represents more than 750 commercial trucking companies, most of whom operate throughout the entire state of Washington. Their operations range from large commercial facilities to small one-man operations.

The proposed revisions to the Industrial Stormwater General Permit represent a concern to the WTA and its members for the following reasons:

- The permit requires that sampling of stormwater discharge be conducted twice a year, once during the wet season and once during the dry season. The cost to commercial trucking firms is of great concern because many of them have multiple operational locations located throughout the state. Commercial trucking profit margins currently range between just one and three percent.
- Will responsibility for industrial stormwater discharge remain with the motor carrier when vehicles are parked away from the carriers' facilities, i.e. truck rest areas, customer facilities, commercial truck stops, etc.?
- What will happen if required stormwater discharge samples contain concentrations above the allowable discharge limits?
- WTA member's operations mainly consist of commercial for-hire trucking and do not typically include on site processes. Are proposed Stormwater General Permit requirements applicable and/or appropriate for their type of operations?